

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

|                           |   |                                  |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, | ) |                                  |
|                           | ) |                                  |
| Plaintiff,                | ) |                                  |
|                           | ) |                                  |
| v.                        | ) | CAUSE NO. 1: 21-cr-00050-SEB-DLP |
|                           | ) |                                  |
| ANTHONY MICHAEL BENTLEY,  | ) |                                  |
|                           | ) |                                  |
| Defendant.                | ) |                                  |

MOTION TO CONTINUE JURY TRIAL

Defendant, Anthony Michael Bentley, by counsel, Andrew J. Borland, respectfully requests this Court to continue the Jury Trial currently scheduled in this cause. The Defendant states the following in support thereof:

1. This case is set for a Jury Trial on March 7, 2022.
2. The parties are still hopeful that a resolution can be reached short of Trial.
3. Counsel for Defendant has a Trial beginning February 7, 2022 in *USA v. Dwyatt Harris* under Cause Number 1:20-cr-0096-TWP-DLP-11 that may last as long as 3 weeks and therefore will need additional time to prepare.
4. Defendant is out of custody.
5. AUSA MaryAnn Mindrum has no objection.
6. Undersigned counsel has discussed with Anthony Michael Bentley his right to a speedy trial and Anthony Michael Bentley waives any objection to a delay in these proceedings caused by this continuance for the reason that he believes the ends of justice served by granting this continuance outweigh the best interest that he and the public would otherwise have in a speedy trial, and that the period of delay resulting from

this continuance to pursue a negotiated resolution or to adequately prepare for trial should be excluded in computing the time within which the trial must commence. 18 U.S.C. §3161(c)(2) and 18 U.S.C. §3161(h)(8)(B)(iv).

WHEREFORE, Defendant, Anthony Michael Bentley, by counsel, Andrew J. Borland, respectfully requests that this Court continue the Jury Trial currently scheduled in this cause, and for all other relief just and proper in the premises.

Respectfully submitted,

By: s/ Andrew J. Borland  
Andrew J. Borland  
Attorney at Law

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2022 a copy of the foregoing motion was filed electronically. Service of this filing was sent to all parties by operation of the Court's electronic filing system.

By: s/ Andrew J. Borland

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